

**THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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NEW JERSEY CARPENTERS VACATION )  
FUND, *On Behalf of Itself and All Others* )  
*Similarly Situated,* ) Docket No.: 08-CV-5093 (HB)  
Plaintiff, )  
v. )  
THE ROYAL BANK OF SCOTLAND GROUP, )  
PLC, GREENWICH CAPITAL ACCEPTANCE, )  
INC., GREENWICH CAPITAL MARKETS, )  
INC., GREENWICH CAPITAL FINANCIAL )  
PRODUCTS, INC., ROBERT J. MCGINNIS, )  
CAROL P. MATHIS, JOSEPH N. WALSH, III, )  
JOHN C. ANDERSON and JAMES C. )  
ESPOSITO, )  
Defendants. )  
\_\_\_\_\_  
ECF CASE

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**NOTICE OF MOTION OF LEAD PLAINTIFF NEW JERSEY CARPENTERS  
VACATION FUND TO MODIFY THE CERTIFIED CLASS TO ENCOMPASS  
ADDITIONAL OFFERINGS AND DESIGNATE ADDITIONAL CLASS  
REPRESENTATIVES**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and along with materials previously submitted in connection with Lead Plaintiff's prior motions for class certification, Lead Plaintiff New Jersey Carpenters Vacation Fund ("Carpenters Vacation Fund"), by counsel, will move this Court pursuant to Rule 23(a), 23(b)(3), and 23(g) of the Federal Rules of Civil Procedure for an Order:

- (i) Modifying the Currently Certified Class to include all initial purchasers on the Original and Additional Offerings (as defined in the accompanying

Memorandum of Law) who purchased directly from the underwriter or its agents within ten trading days of the Offering;<sup>1</sup> and

- (ii) appointing the Carpenters Vacation Fund and Intervenor Plaintiffs Iowa Public Employees Retirement System (“IPERS”) and Midwest Operating Engineers Pension Trust Fund (“Midwest Operating Engineers”) as Class Representatives on behalf of All Offerings.

Dated: New York, New York.  
June 25, 2013

Respectfully submitted,

**COHEN MILSTEIN SELLERS & TOLL PLLC**

/s/ Michael Eisenkraft

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*Attorneys for Plaintiffs and the Class*

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<sup>1</sup> Excluded from the Class are Defendants, and their respective officers, affiliates and directors at all relevant times, members of their immediate families and their legal representatives, executors, estates, administrators, successors and assigns, insurers, and any entity in which any defendants have or had a controlling interest. Also excluded from the Class are Federal National Mortgage Association (“Fannie Mae”) and the Federal Home Loan Mortgage Corporation (“Freddie Mac”).

**CERTIFICATE OF SERVICE**

I, Kenneth M. Rehns, counsel for Plaintiffs and the Class hereby certify that on June 25, 2013, I caused the foregoing document to be filed via ECF which sent a copy of this Notice of Motion by electronic mail to all counsel of record.

/s/ Kenneth M. Rehns  
Kenneth M. Rehns